



Office of Public Board

Public Board

February 16, 2006

215823



The Honorable Vernon A. Williams
Secretary
Surface Transportation Board
1925 K Street, N.W.
Washington, D.C. 20423-0001

Re: Docket No. AB-1081X; San Pedro Railroad Operating Company, LLC - Abandonment
Exemption - In Cochise County, AZ

Dear Mr. Williams:

Union Pacific Railroad Company ("Union Pacific") has reviewed the Offer of Financial Assistance ("OFA") which Sonora-Arizona International, LLC filed with the Surface Transportation Board ("Board") in the above proceeding on February 13, 2006. As we read the OFA, it appears to contemplate that Union Pacific would route traffic over the subject line to an international border crossing to be developed at Nacos, AZ for service to and from the Port of Guaymas, Mexico.

Union Pacific takes no position as to the OFA or the abandonment. We are submitting this letter solely to advise the Board and the parties that Union Pacific's existing routing to and from the Port of Guaymas is the nearby Union Pacific route from Tucson, Arizona to Nogales, where we interchange with Ferrocarril Nacional Mexicano ("FXE"). The Tucson-Nogales-Guaymas route is the most direct route to the Port of Guaymas, and Union Pacific has made substantial capital improvement to its portion of this route. As such, Union Pacific does not intend to utilize the route proposed in the OFA but rather to continue utilizing its existing route via Nogales.

An additional ten (10) copies of this letter are attached for the Board's further use and distribution.

Very truly yours,

Enclosures

cc: All Parties of Record

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Senior General Attorney, Law Department

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the above and foregoing instrument was properly forwarded to all parties of record as listed below by:

- ☒ United States Mail, postage prepaid and sealed;
- ☐ United States Certified Mail, postage prepaid and return receipt requested;
- ☐ Hand Delivery;
- ☐ UPS / Next Day Air;
- ☐ Facsimile Transmission; and/or
- ☐ Local Rule 5.9 Electronic Filing
(U.S.D.C., ND IL).

on this 16th day of February, 2006.

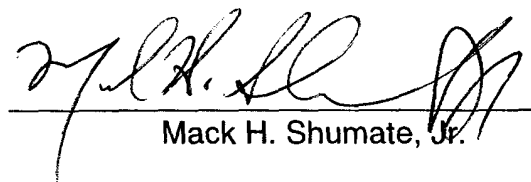
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